

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

IN THE MATTER OF THE APPLICATION OF THE)
UNITED STATES OF AMERICA FOR SEARCH) NO.: 2:23-cr-313
WARRANTS FOR THE CELLULAR TELEPHONES:)
) UNDER SEAL
1. iPhone with black and silver case)
2. Pink iPhone with black case)
3. Black iPhone with black case and cracked screen)
4. White iPhone with no case)

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR SEARCH WARRANTS**

I, JAMES WHITE, a Task Force Officer (TFO) with the Drug Enforcement Administration (DEA), being duly sworn, declare and state:

1. I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7)—that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516. I have been a Detective with the Charleston County Sheriff's Office (CCSO) since November 2015, and am currently assigned to the Drug Enforcement Administration (DEA) Task Force in Charleston, South Carolina. Prior to my employment with the Charleston County Sheriff's Office, I worked as a law enforcement officer with the Hanahan Police Department, South Carolina, for five years. During my time with CCSO Narcotics, I have conducted and/or participated in numerous drug related investigations. In my current role as a Task Force Officer assigned to the DEA Charleston Resident Office, I have conducted investigations involving the illegal importation and distribution of narcotics, weapons and money laundering violations and, among other things,

have conducted or participated in surveillance, the execution of search warrants, debriefings of informants, reviews of recorded conversations, and have conducted or participated in investigations that included the interception of electronic communications. Through my training, education, and experience, I have become familiar with the manner in which illegal drugs are transported, stored, and distributed, the methods of payment for such drugs, the laundering of drug proceeds, and the terminology and coded language used by drug traffickers.

BASIS FOR FACTS CONTAINED IN THIS AFFIDAVIT

1. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, the information was either obtained by me personally or provided by a law enforcement officer, who may have had either direct or hearsay knowledge of the statement, to whom I have spoken, or whose report(s) I have reviewed. Similarly, except where otherwise indicated, information resulting from surveillance does not always set forth my personal observations, but rather those observations provided directly or indirectly by, and/or through other special agents and task force officers of DEA or other law enforcement officers who conducted such surveillance. Because this affidavit is submitted for the limited purpose of showing probable cause, I have not set forth each and every fact learned during the course of this investigation. Facts not set forth herein are not being relied upon in reaching my conclusion that the facts provided establish probable cause.

4. While involved in investigations involving drug trafficking and criminal enterprises, I have communicated extensively with other federal, state, and local law enforcement personnel who specialize or have expertise in this area. Based on my training, experience, and participation in drug trafficking investigations involving cocaine, crack cocaine, heroin, fentanyl,

methamphetamine, MDMA and marijuana, as well as research and from consulting the manufacturer's advertisements and product technical specifications available, I know that cellular telephones have capabilities that allow them to serve as a wireless telephone, digital camera, portable media player and GPS navigation device. In my training and experience, examining data stored on devices of this type can uncover, among other things, evidence that reveals or suggests who possessed or used the device as well as evidence of drug trafficking. I know that electronic devices can store information for long periods of time. Similarly, things that have been viewed via the Internet are typically stored for some period of time on the device. This information can sometimes be recovered with forensics tools and reveal evidence of drug trafficking.

5. As further described in Attachment B, this application seeks permission to locate not only electronically stored information that might serve as direct evidence of the crimes described on the warrant, but also forensic evidence that establishes how each Device was used, the purpose of its use, who used it, and when. There is probable cause to believe that this forensic electronic evidence might be on the Device because data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file).

6. Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit the examination of the device consistent with the warrant. The examination may require authorities to employ techniques, including but not limited to computer-assisted scans of the entire medium, that might expose many parts of the device to human inspection in order to determine whether it is evidence described by the warrant.

PURPOSE OF AFFIDAVIT

7. This Affidavit is being submitted in support of an Application by the United States of America, which seeks search warrants for the following cellular telephones currently in the custody of DEA (Attachment A):

- 1. iPhone with black and silver case**
- 2. Pink iPhone with black case**
- 3. Black iPhone with black case and cracked screen**
- 4. White iPhone with no case**

The applied-for warrant would authorize the forensic examination of the cellular telephones for the purpose of identifying electronically stored data particularly described in Attachment B and conducted in accordance with Attachment C.

SUBJECTS AND OFFENSES

8. The basis for requesting this warrant relates to a criminal investigation focusing on the drug-related activities of Laseto GIBSON, Tyrone POWELL, Trevor GIBBS, and others known and unknown, who are believed to be involved in a conspiracy to distribute controlled substances in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

PROBABLE CAUSE

9. Since approximately March 2021, the DEA has been investigating an organization in the Charleston, SC and Georgetown, SC area receiving shipments of cocaine from Los Angeles, California through the United States Postal Service (USPS). Through the investigation, DEA was determined that GIBSON, POWELL, and GIBBS would fly to Los Angeles, California and ship cocaine laden parcels via USPS to the Charleston and Georgetown areas of South Carolina.

10. On March 24, 2021, United States Postal Inspector (USPIS) Tom Gasser located multiple inbound parcels to the Awendaw and McClellanville area of South Carolina. The

Awendaw address listed was 6606 Highway 17 North and the McClellanville address listed was 730 Society Road¹. One of the parcels was seized by Law Enforcement and after a positive K9 alert to the parcel, a search warrant was obtained and signed. During the execution of the search warrant of the suspected drug parcel, Law Enforcement located approximately 632.5 grams of cocaine.

11. After Surveillance observed GIBSON and GIBBS shipping parcels from Los Angeles, California to Georgetown, South Carolina, USPIS Gasser located and identified the inbound parcels. On August 21, 2021, USPIS Gasser and DEA TFO White seized a second inbound parcel to the Georgetown area; address listed as 1807 Winyah Street. A search warrant for the parcel was obtained after a positive K9 alert. During the execution of the search warrant, Law Enforcement located approximately 1142.2 grams of cocaine. On August 26, 2021, a person, who identified themselves as “Henry”, called the Post Office inquiring about the seized parcel. The phone number used to call the post office was GIBSON’s 843-505-8100² number.

12. On September 1, 2021, USPIS Gasser and TFO White located another group of parcels being shipped from GIBSON, GIBBS, and POWELL. DEA Charleston established surveillance on the parcel intended for 1530 Charity Church Road. Surveillance units observed the parcel being delivered. Surveillance units identified POWELL arrive at the residence driving a Mercedes sedan displaying South Carolina license plate SZD-514³. POWELL was observed

¹ A search query through databases accessible by Law Enforcement shows Tyrone Powell associated to 730 Society Road. A search query through South Carolina Department of Motor Vehicles shows 730 Society Road listed on Tyrone Powell’s issued South Carolina Driver’s License.

² 843-505-8100 was discovered, through the investigations into the GIBSON DTO, as the phone number utilized by GIBSON to purchase his airline tickets to fly to Los Angeles, California.

³ A search query through South Carolina Department of Motor Vehicles show this vehicle registered to address 730 Society Road. This is also the same vehicle, DEA observed POWELL arriving to the airport to fly to Los Angeles and leaving the airport when returning from Los Angeles.

receiving the parcel and leaving the residence of 1530 Charity Church Road and driving to 730 Society Road.

13. On November 8, 2021, USPIS Gasser identified three inbound parcels coming from Los Angeles to Huger and Georgetown areas of South Carolina. The parcel intended for 136 Howard Road in Huger was seized by USPIS Gasser. After a positive K9 alert, a search warrant was obtained for the parcel. An execution of the search warrant was completed and USPIS Gasser and USPIS TFO James Howard located approximately 292.5 grams of cocaine. On August 8, 2021, USPS received a phone call from phone number 843-359-6829⁴ and inquiring about the 136 Howard Road parcel. The male subject on the phone identified himself as “Cyrone Powell”.

14. On February 8, 2022, GIBSON, GIBBS, and POWELL were all indicted by a Federal Grand Jury. On March 16, 2022, DEA Charleston arrested GIBSON, GIBBS, and POWELL. During the arrest of GIBSON, DEA located two cell phones on GIBSON (**iPhone with black and silver case and a pink iPhone with a black case**). During the arrest of GIBBS, DEA located one cell phone on GIBBS (**black iPhone with black case and cracked screen**). During the arrest of POWELL, DEA located one cell phone on POWELL (**white iPhone with no case**). GIBSON, GIBBS, and POWELL were all placed in custody and transported to the Al Cannon Detention Center in Charleston County. The four cell phones located were placed in evidence and stored at the DEA Charleston Resident Office.

15. Based on my training and experience, I know that drug traffickers commonly carry multiple cellular telephones in order to segregate portions of their business and/or co-conspirators

⁴ Through investigations, DEA learned that phone number 843-359-6829 is the same phone number that POWELL uses for his airline tickets when he was flying from Charleston to Los Angeles.

in the event that one telephone is intercepted or seized by law enforcement. Based on the surveillance and seizure described above, I believe that there is probable cause that GIBSON, GIBBS, and POWELL used the cellular telephones listed in paragraph 7 above to further their drug trafficking; specifically to coordinate the delivery of cocaine coming from Los Angeles and distributing it in South Carolina.


AUTHORIZATION REQUEST

16. Based on the foregoing, I believe that the 4 cellular telephones **(1. iPhone with black and silver case, 2. Pink iPhone with black case, 3. Black iPhone with black case and cracked screen, 4. White iPhone)** contain evidence, fruits, or instrumentalities of drug trafficking in violation of Title 21, U.S.C., Section 841(a)(1) and 846. In this affidavit I am only seeking authority to search the cellular telephones for the items listed in Attachment B.

This affidavit has been reviewed by AUSA Whit Sowards.

<<< SIGNATURES ON NEXT PAGE >>>

Respectfully submitted,



James White
Task Force Officer
Drug Enforcement Administration

SWORN TO ME VIA TELEPHONE OR
OTHER RELIABLE ELECTRONIC MEANS
AND SIGNED BY ME PURSUANT TO
FED. R. CRIM. P. 4.1 AND 4(d) OR 41(d)(3),
AS APPLICABLE

This __11__ day of __April__, 2022
Charleston, South Carolina



The Honorable Mary Gordon Baker
UNITED STATES MAGISTRATE JUDGE